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15 UNITED STATES DISTRICT COURT FOR THE
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION
18

19 HENRY A. KLYCE and CAROLE M. KLYCE, Case No. 11-cv-02248-WHA (BZ)

20 Plaintiffs,

21 v.

22 JOHN WHEELER, *et al.*,

23 Defendants.
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~~PROPOSED~~ STIPULATED
INJUNCTION

1 The parties to the above-referenced action, having entered into a Confidential Settlement
2 And Release on November 17, 2011, and with no admission of liability by either party, hereby
3 stipulate to the terms of injunctive relief set forth herein.

4 WHEREFORE, with the consent of the parties, and through their respective counsel, IT
5 IS HEREBY ORDERED as follows:

6 1) the parties shall refrain from accessing, deleting content from, forwarding or
7 redirecting email from, changing account recovery information for, denying access to, or
8 otherwise interfering in any way with any email account or any other online account – including,
9 but not limited to, social networking accounts – in the name of any other party;

10 2) Defendants Ellen Klyce and Katherine Klyce (on the one hand) and Plaintiffs
11 Henry Klyce and Carole Klyce (on the other hand) agree to refrain from contacting each other
12 via email or from directing any third party to do the same – except with regard to
13 communications to or from Henry Klyce which directly relate to any specific business
14 investment;

15 3) the parties shall not comment to any third parties about their siblings in
16 connection with any comments made about the murder of Emily Klyce Fisher;

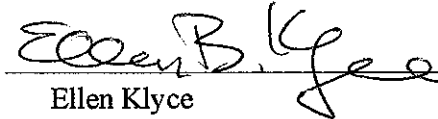
17 4) Except for in response to valid requests from law enforcement, Carole Klyce shall
18 not comment publicly regarding the murder of Emily Klyce Fisher;

19 5) Plaintiffs Henry Klyce and Carole Klyce agree not to comment regarding the
20 death of John Wheeler and, if Plaintiffs Henry Klyce and Carole Klyce are contacted by any non-
21 party about the death of John Wheeler, they shall respond “I have been advised by counsel not to
22 comment on the death of John Wheeler” and to say no more; and

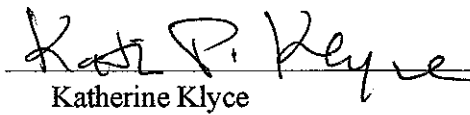
23 6) The parties shall conduct no investigations into the personal lives of any other
24 party absent a pending legal proceeding.
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2 8. This Court shall retain jurisdiction to resolve any dispute or controversy between
3 the parties arising under or in connection with this Stipulated Injunction, or to enforce this
4 Stipulated Injunction. A magistrate judge may be assigned to resolve any such controversy or
5 dispute.

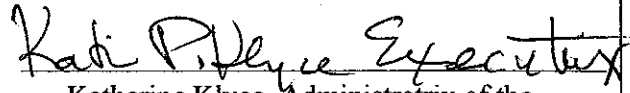
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7 Dated: 11/17/11

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Ellen Klyce

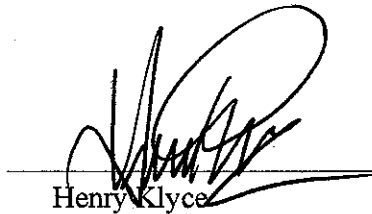
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10 Dated: 11/17/11

11 
Katherine Klyce


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13 Dated: 11/17/11

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Katherine Klyce, Administratrix of the
15 estate of John Wheeler

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17 Dated: 11/17/11


18 
Henry Klyce

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20 Dated: 11/17/11

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Carole Klyce

1 **Approved as to form:**

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3 Dated: 11-17-2011


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6
7 Dated: 11/17/11



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10
11 Dated: 11/17/11


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16 **IT IS SO ORDERED.**

18
19 Dated: 11-18-11


THE HONORABLE WILLIAM ALSUP
UNITED STATES DISTRICT COURT JUDGE